

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 25-CR-89

v.

HANNAH C. DUGAN,

Defendant.

**JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER GOVERNING
DISCOVERY**

The United States of America, by Acting United States Attorney Richard G. Frohling, and defendant Hannah C. Dugan, by her counsel Steven M. Biskupic, Jason D. Luczak and Nicole M. Masnica, hereby moves under Rule 16(d)(1) of the Federal Rules of Criminal Procedure for a protective order regulating the dissemination of discovery material in this case.

1. The indictment in this case charges the defendant with concealing an individual from discovery or arrest, in violation of 18 U.S.C. § 1071, and endeavoring to obstruct a federal proceeding, in violation of 18 U.S.C. § 1505.
2. The discovery to be provided by the government in this case includes videos, photographs, and reports containing personal identifying information of third parties, whose unrestricted dissemination could adversely affect the privacy interests of third parties.
3. The parties worked together to draft the proposed protective order restricting dissemination of the discovery in this matter for use only for the litigation of this case.

The parties jointly move the Court to enter the proposed protective order.

Respectfully submitted this 14th day of May, 2025, at Milwaukee, Wisconsin.

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